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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MYRA MELISSA ZYCH, 　　　　　　Plaintiff, 　　v. KILOLO KIJAKAZI, ACTING COMMISSIONER OF SOCIAL SECURITY, 　　　　　　Defendant.	)))　CASE NO.)　2:22-cv-02038-DJA))　**UNOPPOSED MOTION**)　**FOR EXTENSION OF TIME TO FILE**)　**PLAINTIFF'S BRIEF**))))

　　　Plaintiff by her attorney, moves for a sixty (60) day extension of time to file Plaintiff's

opening brief. Plaintiff's opening brief is currently due to be filed April 7, 2023.

　　　Counsel requires additional time to properly and thoroughly prepare Plaintiff's brief. For

instance, between March 31, and May 30, 2023, staff in Counsel's office have one hundred and

ninety (190) Plaintiff briefs due. This figure does not include oral arguments, appeals to Circuit

Courts, reply briefs, settlement negotiations, and the various other tasks which arise throughout

the course of litigation.

　　　These circumstances do not allow for Plaintiff's Counsel to properly prepare the opening

brief by the current deadline. This request will not cause Defendant any undue hardship.

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Wherefore, Plaintiff requests an extension from April 7, 2023 up to and including June 6, 2023 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who has no objection to this request.
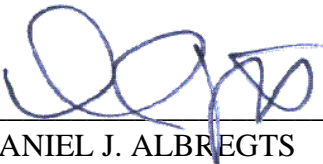
Dated March 31, 2023.

Respectfully submitted,

/s/Hal Taylor

Plaintiff's Certificate of Service:

I certify that I caused the Consent Motion for Extension of Time to be served today, March 31, 2023, by CMECF to Franco Becia, and Blaine T Welsh who are filing users of the CM/ECF system.

/s/Hal Taylor
Hal Taylor

IT IS SO ORDERED.

DATED: April 4, 2023

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DANIEL J. ALBREGTS
UNITED STATES MAGISTRATE JUDGE